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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COLLEGIUM FUND SERIES 32, a Nevada  
limited-liability company,

Plaintiff,

v.

MARK DANIEL SNYDER, an individual;  
WELLS FARGO BANK, N.A.; DOES I  
THROUGH X; and ROE  
CORPORATIONS 1 THROUGH 10,

Defendants.

WELLS FARGO BANK, N.A., a national  
banking association,

Counter-Claimants,

v.

COLLEGIUM FUND SERIES 32, a Nevada  
limited-liability company, ABSOLUTE  
COLLECTION SERVICES, LLC, a Nevada  
limited liability company; NUEVO VISTA  
HOMEOWNERS ASSOCIATION, INC., a  
Nevada non-profit cooperative corporation,

Counter-Defendants.

Case No.: 2:16-cv-01640-JCM-PAL

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
FEDERAL HOME LOAN  
MORTGAGE CORPORATION'S  
MOTION FOR SUMMARY  
JUDGMENT**

**(SECOND REQUEST)**

1 FEDERAL HOME LOAN MORTGAGE  
2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada  
6 limited-liability company, ABSOLUTE  
7 COLLECTION SERVICES, LLC, a Nevada  
8 limited liability company; NUEVO VISTA  
HOMEOWNERS ASSOCIATION, INC., a  
Nevada non-profit cooperative corporation,

Counter-Defendants.

9 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation  
10 (“Freddie Mac”), Collegium Fund Series 32 (“Collegium Fund”), Absolute Collection Services, LLC  
11 (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and through their  
12 respective counsel, hereby respectfully request that the Court enter an order, pursuant to Local Rules  
13 6-1 and 7-1, extending the time for Collegium Fund, ACS, and the HOA to respond to the Motion  
14 for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF No. 26] and  
15 joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The response to the MSJ is currently due  
16 on March 7, 2017. The Parties have agreed to extend this response date to March 28, 2017.

17 The extension is being sought in good faith and will not unduly delay this litigation. Freddie  
18 Mac has recently discovered additional documents that may be responsive to Collegium Fund’s  
19 discovery requests. Freddie Mac is in the process of reviewing the documents for production.  
20 Collegium Fund, the HOA, and ACS would like some time to review these additional documents  
21 before responding to the MSJ.

22 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend  
23 the time to respond to the MSJ from March 7, 2017 to March 28, 2017.

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DATED this 6<sup>th</sup> day of March, 2017.

CONNAGHAN|NEWBERRY

SNELL & WILMER L.L.P.

/s/ Paul Connaghan (with permission)

/s/ Nathan Kanute

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**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED: March 8, 2017

Snell & Wilmer

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**CERTIFICATE OF SERVICE**

As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO FEDERAL HOME LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY JUDGMENT** on the 6<sup>th</sup> day of March, 2017 by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

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/s/ Lara J. Taylor  
An employee of Snell & Wilmer L.L.P.